

EXHIBIT F

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By E-mail (adam.hobson@usdoj.gov)

Adam S. Hobson
Assistant United States Attorney
United States Attorney's Office
Southern District of New York
One St. Andrew's Plaza
New York, NY 10007

Re: Count Cooks (*United States v. Lewis et al.*, 20-CR-00234)

Dear Adam:

On behalf of Count Cooks, we write to request that the government provide a bill of particulars pursuant to Federal Rules of Criminal Procedure 7(f) and 16, and the Fifth and Sixth Amendments to the U.S. Constitution, to permit Mr. Cooks to prepare his defense, avoid unfair surprise at trial, and to provide a basis to plead double jeopardy if he is later prosecuted for the same offense. On October 16, 2020, the government produced certain discovery materials but those materials do not appear to provide the information sought in this letter. This letter does not limit or qualify in any respect our October 5, 2020 letter, which requested the disclosure of certain information pursuant to Rule 16 and *Brady v. Maryland*.

Specifically, we request that the government provide the following information:

1. The identities of all alleged co-conspirators known to the government.
2. With respect to Count One (Indictment ¶¶ 1-9), identify:
 - a. The approximate date on which Mr. Cooks is alleged to have joined or become associated with the Enterprise; and
 - b. The specific criminal acts that the government alleges Mr. Cooks committed, or conspired or attempted to commit, in the conduct of the affairs of the charged Enterprise, including the date, time, location, and any alleged victims of such acts.
3. Identify the date, time, location, and alleged victim of the robbery alleged in Counts Four, Five and Six.
4. Identify the date on which and location where the government alleges Mr. Cooks used, carried, or possessed (or aided or abetted the use, carry, or possession of) the firearms referenced in Count Eleven.

Adam S. Hobson
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5. Identify any other alleged criminal conduct committed by Mr. Cooks regarding which the government intends to present evidence at trial, including the date, time, location, and any alleged victims of such conduct.

We reserve the right to supplement or amend these requests. If you have any questions regarding these requests, please do not hesitate to call us. We are available to meet and confer with you to resolve or narrow any potential disagreements.

Very truly yours,

/s/ Darren. A. LaVerne

Darren A. LaVerne

Leah S. Friedman

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Attorneys for Defendant Count Cooks